



MEMO ENDORSED

Pamela M. Harinstein
914.872.7355 (Direct)

pamela.harinstein@wilsonelser.com

August 30, 2024

VIA E-FILE ON PACER

Honorable Judge Nelson S. Román
United States District Judge
United States District Court, Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Re: Joan Colletti v. White Plains Hospital, St. Vincent Hospital Westchester,
Alejandro Ramirez, Cynthia Perry, Julia Novikov, John Does 1-5
Federal Court Case No. : 7:23-cv-07071-NSR
Our File No. : 22920.01411

Dear Honorable Judge Nelson S. Roman and Magistrate Judge Victoria Reznik:

My name is Pamela Harinstein and I represented Julia Novikov, M.D. in this matter. I am respectfully writing on behalf of all of the parties on this case to request an extension to submit a scheduling order until September 6, 2024. Mr. Lord, counsel for the plaintiff, has communicated that he has a personal emergency and would not be available to confer until next week. He has asked me to draft this letter. Additionally, while plaintiff provided some authorizations, we are still awaiting a full response to our demand that was discussed at the last conference.

Thank you.

Very truly yours,

Wilson Elser Moskowitz Edelman & Dicker LLP

Pamela M. Harinstein

The parties' request for an extension of time to submit a joint status letter is **GRANTED**. The parties' status letter is due by no later than **September 6, 2024**. The parties' letter should detail the progress of discovery over the prior month, the anticipated next steps in the upcoming month, and propose new deadlines for the completion of fact and expert discovery.

APPLICATION GRANTED

Hon. Victoria Reznik, U.S.M.J.

Dated: August 30, 2024



cc: **VIA E-FILE ON PACER**

Masai I. Lord
LORD LAW GROUP, PLLC
14 Wall Street, Ste 1603
New York, New York 10005

David Wysnewksi
Barry McTiernan & Moore, LLC
101 Greenwich Street, 14th Floor
New York, New York 10006